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September 26, 2016

VIA ECF

Honorable Joanna Seybert U.S.D.J.
United States District Court
Eastern District of New York
100 Federal Building
Central Islip, NY 11722-9014

RE: Plaintiffs' Letter Motion for Extension of Discovery Deadline
Jie Zhang et al v. Wen Mei, Inc., d/b/a Hunan Dynasty et al 14-cv-01647

Dear Hon. Judge Seybert:

We represent the above named Plaintiffs in the above mentioned case. We write to respectfully request the Court to extend the time for the parties to complete discovery for a period of forty-five (45) days.

Per the Court's Second Amended Scheduling Order dated February 10, 2016, the deadline for completion of depositions is September 30, 2016. The reason for this request is that there are pending motions before the Court for leave to file an amended complaint and for leave to file a late consent to join. Defendants consent to this request for extension of the discovery deadline. Plaintiffs therefore respectfully request that the Court extend the time to complete discovery.

We thank this Court for time and consideration for this matter.

Respectfully submitted,
TROY LAW, PLLC

/s/ John Troy

John Troy

*Attorney for Plaintiffs, proposed
FLSA Collective and Potential Rule
23 Class*